

Deposition of James Lee Sons, taken December 8, 2016

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1           IN THE UNITED STATES DISTRICT COURT FOR THE  
2                       NORTHERN DISTRICT OF MISSISSIPPI  
3                       OXFORD DIVISION

4       JAMES LEE SONS, individually and  
5       on behalf of the wrongful death  
6       beneficiaries of JAMES ALLEN  
7       PARKS SONS, deceased                       PLAINTIFFS  
8       VS.                               NO. 3:16-CV-181-MPM-RP  
9       BENTON COUNTY, MISSISSIPPI, ET AL       DEFENDANTS

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11           VIDEOTAPED DEPOSITION OF JAMES LEE SONS

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13  
14           TAKEN AT THE INSTANCE OF THE DEFENDANTS  
15       IN THE LAW OFFICES OF FARESE, FARESE & FARESE, P.A.  
16           122 CHURCH STREET, ASHLAND, MISSISSIPPI  
17           ON DECEMBER 8, 2016, BEGINNING AT 9:54 A.M.

18  
19           APPEARANCES NOTED HEREIN

20  
21  
22       Reported by: REGINA D. RUSSELL, RPR, CCR 1110

23       \_\_\_\_\_  
24           ADVANCED COURT REPORTING  
25           P.O. BOX 761  
          TUPELO, MS 38802-0761  
          (662) 690-1500

1 at this point.

2 Q. Okay. And that was based on his anger  
3 issues and --

4 A. And the thing up with the --

5 Q. The gun?

6 A. Yeah. The gun, shooting outside.

7 Q. Right. And I assume maybe based on your  
8 previous experience with him?

9 A. Correct.

10 Q. Okay. But, again, he had not told you that  
11 he was going to kill himself and he had not put a gun  
12 in his mouth or, as far as you know, threatened to  
13 hurt himself?

14 A. Right.

15 Q. At least in this time period; is that  
16 correct?

17 A. Yeah, that's correct.

18 Q. Okay. Now, based -- after your  
19 conversation with Joe on September 18th, 2015, you  
20 traveled over to the chancery clerk's office in  
21 Benton County. Do you remember doing that?

22 A. Yes.

23 Q. Do you remember speaking with the chancery  
24 clerk or one of her assistants?

25 A. Chancery clerk.

1 Q. What is her or his name; do you remember?

2 A. No. But I got it wrote down.

3 Q. That's fine. It's not a memory contest.

4 I'm just trying to find out what you know. Now, I  
5 want to turn your attention to Exhibit 3. Okay? If  
6 you want to get your glasses.

7 A. Yes.

8 Q. Exhibit 3 is what we call a Writ to Take  
9 Custody. This is the court order issued by the  
10 chancery court designee giving Joe Batts and the  
11 Benton County Sheriff's Department an order to go and  
12 detain Jimmy. Okay?

13 A. Okay.

14 Q. I'll represent to you that. And I don't  
15 see your handwriting anywhere on that first page.  
16 Will you confirm that for me, please, sir?

17 A. Yes. This is my handwriting.

18 Q. Okay.

19 A. Looks like my printing.

20 Q. I think that's Mr. Batts' handwriting, but  
21 I don't know that to be the case. But you believe  
22 that's your handwriting?

23 A. Yeah. But, I mean, she could have had her,  
24 they kind of look close to the same too.

25 Q. Okay. Do you remember writing James Sons,